

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

## JULIA HUBBARD, and KAYLA GOEDINGHAUS

vs.

TRAMMELL S. CROW, JR., BENJAMIN  
TODD ELLER, RICHARD HUBBARD,  
MELISSA MILLER, SCOTT WOODS,  
MRUGESHKUMAR SHAH, MICHAEL CAIN,  
COE JURACEK, PHILIP ECOB, H.J. COLE,  
CODY MITCHELL, KURT KNEWITZ,  
PAUL PENDERGRASS, RALPH ROGERS,  
ROBERT PRUITT, SCOTT BRUNSON,  
CASE FROVER, RICHARD BUTLER,  
MARC MOLINA, MICHAEL HYNES, JR.,  
SHAWN MAYER, JADE MAYER,  
AARON BURLINGAME, RCI HOSPITALITY  
HOLDINGS, INC., INTEGRITY BASED  
MARKETING, LLC, STORM FITNESS  
NUTRITION, LLC, ULTRA COMBAT  
NUTRITION, LLC, ECOLOFT HOMES, LLC,  
ELEVATED WELLNESS PARTNERS LLC,  
DOE INDIVIDUALS 1-50; AND  
DOE COMPANIES 1-50

**CIVIL NO. 5:23-cv-00580-FB**

**DEFENDANT, ROBERT PRUITT'S ORIGINAL ANSWER TO  
PLAINTIFFS' AMENDED COMPLAINT**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS:

NOW COMES, Defendant, **ROBERT PRUITT**, and files his Original Answer to Plaintiffs' Amended Complaint, and would show the Court the following:

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1. Paragraph 1 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 1 of Plaintiffs' Amended Petition.

2. Paragraph 2 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 2 of Plaintiffs' Amended Petition.

3. Paragraph 3 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 3 of Plaintiffs' Amended Petition.

4. Defendant denies the allegations in Paragraph 4 of the Plaintiffs' Amended Petition.

5. Paragraph 5 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 5 of Plaintiffs' Amended Petition.

6. Defendant denies the allegations in Paragraph 6 of the Plaintiffs' Amended Petition.

7. Paragraph 7 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 7 of Plaintiffs' Amended Petition.

8. Paragraph 8 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 8 of Plaintiffs' Amended Petition.

9. Paragraph 9 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 9 of Plaintiffs' Amended Petition.

10. Paragraph 10 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 10 of Plaintiffs' Amended Petition.

11. Paragraph 11 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 11 of Plaintiffs' Amended Petition.

12. Paragraph 12 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 12 of Plaintiffs' Amended Petition.

13. Paragraph 13 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 13 of Plaintiffs' Amended Petition.

14. Paragraph 14 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 14 of Plaintiffs' Amended Petition.

15. Paragraph 15 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 15 of Plaintiffs' Amended Petition.

16. Paragraph 16 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 16 of Plaintiffs' Amended Petition.

17. Paragraph 17 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 17 of Plaintiffs' Amended Petition.

18. Paragraph 18 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 18 of Plaintiffs' Amended Petition.

19. Paragraph 19 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 19 of Plaintiffs' Amended Petition.

20. Paragraph 20 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 20 of Plaintiffs' Amended Petition.

21. Paragraph 21 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 21 of Plaintiffs' Amended Petition.

22. Paragraph 22 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 22 of Plaintiffs' Amended Petition.

23. Paragraph 23 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 23 of Plaintiffs' Amended Petition.

24. Paragraph 24 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 24 of Plaintiffs' Amended Petition.

25. Paragraph 25 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 25 of Plaintiffs' Amended Petition.

26. Paragraph 26 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 26 of Plaintiffs' Amended Petition.

27. Paragraph 27 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 27 of Plaintiffs' Amended Petition.

28. Paragraph 28 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 28 of Plaintiffs' Amended Petition.

29. Paragraph 29 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 29 of Plaintiffs' Amended Petition.

30. Paragraph 30 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 30 of Plaintiffs' Amended Petition.

31. Paragraph 31 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 31 of Plaintiffs' Amended Petition.

32. Paragraph 32 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 32 of Plaintiffs' Amended Petition.

33. Paragraph 33 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 33 of Plaintiffs' Amended Petition.

34. Paragraph 34 does not appear to involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny most of the allegations in Paragraph 34 of Plaintiffs' Amended Petition. To the extent the paragraph claims that this Defendant was one of "many of the Investor Defendants" who allegedly attended the parties described in the paragraph, such is specifically denied.

35. Paragraph 35 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 35 of Plaintiffs' Amended Petition.

36. Paragraph 36 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 36 of Plaintiffs' Amended Petition.

37. Paragraph 37 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 37 of Plaintiffs' Amended Petition.

38. Defendant is without sufficient factual knowledge to admit or deny most of the allegations in Paragraph 38 of Plaintiffs' Amended Petition as to the other listed "Investment Defendants." As to this Defendant, however, all of the allegations in Paragraph 38 are denied.

39. Defendant is without sufficient factual knowledge to admit or deny most of the allegations in Paragraph 39 of Plaintiffs' Amended Petition as to the other listed "Investment Defendants." As to this Defendant, however, all of the allegations in Paragraph 39 are denied.

40. Paragraph 40 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 40 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" described in Paragraph 40.

41. Paragraph 41 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 41 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 41.

42. Paragraph 42 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 42 of Plaintiffs' Amended Petition.

43. Paragraph 43 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 43 of Plaintiffs' Amended Petition.

44. Paragraph 44 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 42 of Plaintiffs' Amended Petition.

45. Paragraph 45 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 45 of Plaintiffs' Amended Petition.

46. Paragraph 46 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 46 of Plaintiffs' Amended Petition.

47. Paragraph 47 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 47 of Plaintiffs' Amended Petition.

48. Paragraph 48 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 48 of Plaintiffs' Amended Petition.

49. Paragraph 49 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 49 of Plaintiffs' Amended Petition.

50. Paragraph 50 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 50 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 50.

51. Paragraph 51 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 51 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 51.

52. Defendant agrees that venue is appropriate in the Western District of Texas as alleged in paragraph 52 of Plaintiffs' Amended Petition.

53. Paragraph 53 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 53 of Plaintiffs' Amended Petition.

54. Paragraph 54 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 54 of Plaintiffs' Amended Petition.

55. Paragraph 55 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 55 of Plaintiffs' Amended Petition.

56. Paragraph 56 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 56 of Plaintiffs' Amended Petition.

57. Paragraph 57 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 57

of Plaintiffs' Amended Petition as they pertain to him. Defendant lacks sufficient information to admit or deny the remainder of the allegations in Paragraph 57.

58. Paragraph 58 sets forth a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the allegations in paragraph 58 of Plaintiffs' Amended Petition.

59. Paragraph 59 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 59 of Plaintiffs' Amended Petition.

60. Paragraph 60 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 60 of Plaintiffs' Amended Petition.

61. Paragraph 61 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 61 of Plaintiffs' Amended Petition.

62. Paragraph 62 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 62 of Plaintiffs' Amended Petition.

63. Paragraph 63 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 61 of Plaintiffs' Amended Petition.

64. Paragraph 64 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 64 of Plaintiffs' Amended Petition.

65. Paragraph 65 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 65 of Plaintiffs' Amended Petition.

66. Paragraph 66 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 66 of Plaintiffs' Amended Petition.

67. Paragraph 67 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 67 of Plaintiffs' Amended Petition.

68. Paragraph 68 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 68 of Plaintiffs' Amended Petition.

69. Paragraph 69 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 69 of Plaintiffs' Amended Petition.

70. Paragraph 70 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 70 of Plaintiffs' Amended Petition.

71. Paragraph 71 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 71 of Plaintiffs' Amended Petition.

72. Paragraph 72 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 72 of Plaintiffs' Amended Petition.

73. Paragraph 73 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 73 of Plaintiffs' Amended Petition.

74. Paragraph 74 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 74 of Plaintiffs' Amended Petition.

75. Defendant admits the allegation in Paragraph 75.

76. Paragraph 76 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 76 of Plaintiffs' Amended Petition.

77. Paragraph 77 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 77 of Plaintiffs' Amended Petition.

78. Paragraph 78 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 78 of Plaintiffs' Amended Petition.

79. Paragraph 79 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 79 of Plaintiffs' Amended Petition.

80. Paragraph 80 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 80 of Plaintiffs' Amended Petition.

81. Paragraph 81 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 81 of Plaintiffs' Amended Petition.

82. Paragraph 82 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 82 of Plaintiffs' Amended Petition.

83. Paragraph 83 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 83 of Plaintiffs' Amended Petition.

84. Paragraph 84 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 84 of Plaintiffs' Amended Petition.

85. Paragraph 85 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 85 of Plaintiffs' Amended Petition.

86. Paragraph 86 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 86 of Plaintiffs' Amended Petition.

87. Paragraph 87 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 87 of Plaintiffs' Amended Petition.

88. Paragraph 88 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 88 of Plaintiffs' Amended Petition.

89. Paragraph 89 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 89 of Plaintiffs' Amended Petition.

90. Paragraph 90 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 90 of Plaintiffs' Amended Petition.

91. Paragraph 91 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 91 of Plaintiffs' Amended Petition.

92. Paragraph 92 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 92 of Plaintiffs' Amended Petition.

93. Paragraph 93 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 93 of Plaintiffs' Amended Petition.

94. Paragraph 90 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 94 of Plaintiffs' Amended Petition.

95. Paragraph 95 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 95 of Plaintiffs' Amended Petition.

96. Paragraph 90 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 96 of Plaintiffs' Amended Petition.

97. Paragraph 90 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 97 of Plaintiffs' Amended Petition.

98. Paragraph 98 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 98 of Plaintiffs' Amended Petition.

99. Paragraph 99 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 99 of Plaintiffs' Amended Petition.

100. Paragraph 100 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 100 of Plaintiffs' Amended Petition.

101. Paragraph 101 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 101 of Plaintiffs' Amended Petition.

102. Paragraph 102 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 102 of Plaintiffs' Amended Petition.

103. Paragraph 100 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 103 of Plaintiffs' Amended Petition.

104. Paragraph 100 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 104 of Plaintiffs' Amended Petition.

105. Paragraph 100 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 105 of Plaintiffs' Amended Petition.

106. Paragraph 100 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 106 of Plaintiffs' Amended Petition.

107. Paragraph 107 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 107 of Plaintiffs' Amended Petition.

108. Paragraph 108 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 108 of Plaintiffs' Amended Petition.

109. Paragraph 109 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 109 of Plaintiffs' Amended Petition.

110. Paragraph 110 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 110 of Plaintiffs' Amended Petition.

111. Paragraph 111 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 111 of Plaintiffs' Amended Petition.

112. Paragraph 112 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 112 of Plaintiffs' Amended Petition.

113. Paragraph 113 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 113 of Plaintiffs' Amended Petition.

114. Paragraph 114 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 114 of Plaintiffs' Amended Petition.

115. Paragraph 110 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 115 of Plaintiffs' Amended Petition.

116. Paragraph 116 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 116 of Plaintiffs' Amended Petition.

117. Paragraph 117 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 117 of Plaintiffs' Amended Petition.

118. Paragraph 118 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 118 of Plaintiffs' Amended Petition.

119. Paragraph 119 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 119 of Plaintiffs' Amended Petition.

120. Paragraph 120 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 120 of Plaintiffs' Amended Petition.

121. Paragraph 121 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 121 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 121.

122. Paragraph 122 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 122 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 122.

123. Paragraph 123 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 123 of Plaintiffs' Amended Petition.

124. Paragraph 124 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 124 of Plaintiffs' Amended Petition.

125. Paragraph 125 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 125 of Plaintiffs' Amended Petition.

126. Paragraph 126 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 126 of Plaintiffs' Amended Petition.

127. Paragraph 127 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 127 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 127.

128. Paragraph 128 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 128 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 128.

129. Paragraph 129 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 129 of Plaintiffs' Amended Petition.

130. Paragraph 130 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 130 of Plaintiffs' Amended Petition.

131. Paragraph 131 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 131 of Plaintiffs' Amended Petition.

132. Paragraph 132 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 132 of Plaintiffs' Amended Petition.

133. Paragraph 133 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 133 of Plaintiffs' Amended Petition.

134. Paragraph 134 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 134 of Plaintiffs' Amended Petition.

135. Paragraph 135 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 135 of Plaintiffs' Amended Petition.

136. Paragraph 136 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 136 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 136.

137. Paragraph 137 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 137 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 137.

138. Paragraph 138 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 138 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 138.

139. Paragraph 136 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 139 of Plaintiffs' Amended Petition.

140. Paragraph 140 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 140 of Plaintiffs' Amended Petition.

141. Paragraph 141 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 141 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 141.

142. Paragraph 142 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 142 of Plaintiffs' Amended Petition.

143. Paragraph 143 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 143 of Plaintiffs' Amended Petition.

144. Paragraph 144 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 144 of Plaintiffs' Amended Petition.

145. Paragraph 145 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 145 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 145.

146. Paragraph 146 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 146 of Plaintiffs' Amended Petition.

147. Paragraph 147 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 147 of Plaintiffs' Amended Petition.

148. Paragraph 148 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 148 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 148.

149. Paragraph 149 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 149 of Plaintiffs' Amended Petition.

150. Paragraph 150 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 150 of Plaintiffs' Amended Petition.

151. Paragraph 151 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 151 of Plaintiffs' Amended Petition.

152. Paragraph 152 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 152 of Plaintiffs' Amended Petition.

153. Paragraph 153 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 153 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 153.

154. Paragraph 154 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 154 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 154.

155. Paragraph 155 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 155 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 155.

156. Paragraph 156 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 156 of Plaintiffs' Amended Petition.

157. Paragraph 157 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 157 of Plaintiffs' Amended Petition.

158. Paragraph 158 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 158 of Plaintiffs' Amended Petition.

159. Paragraph 159 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 159 of Plaintiffs' Amended Petition.

160. Paragraph 160 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 160 of Plaintiffs' Amended Petition.

161. Paragraph 161 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 161 of Plaintiffs' Amended Petition.

162. Paragraph 162 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 162 of Plaintiffs' Amended Petition.

163. Paragraph 163 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 163 of Plaintiffs' Amended Petition.

164. Paragraph 164 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 164 of Plaintiffs' Amended Petition.

165. To the extent Paragraph 165 somehow involves an allegation against this Defendant as an "Investor Defendant," Defendant denies the allegations in Paragraph 165 of Plaintiffs' Amended Petition.

166. Paragraph 166 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 166 of Plaintiffs' Amended Petition.

167. Paragraph 167 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 167 of Plaintiffs' Amended Petition.

168. Paragraph 168 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 168 of Plaintiffs' Amended Petition.

169. Paragraph 169 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 169 of Plaintiffs' Amended Petition.

170. Paragraph 170 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 170 of Plaintiffs' Amended Petition.

171. Paragraph 171 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 171 of Plaintiffs' Amended Petition.

172. Paragraph 172 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 172 of Plaintiffs' Amended Petition.

173. Paragraph 173 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 173 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 173.

174. Paragraph 174 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 174 of Plaintiffs' Amended Petition.

175. Paragraph 175 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 175 of Plaintiffs' Amended Petition.

176. Paragraph 176 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 176 of Plaintiffs' Amended Petition.

177. Paragraph 177 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 177 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 177.

178. Paragraph 178 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 178 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 178.

179. Paragraph 179 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 179 of Plaintiffs' Amended Petition.

180. Paragraph 180 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 180 of Plaintiffs' Amended Petition.

181. Paragraph 181 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 181 of Plaintiffs' Amended Petition.

182. Paragraph 182 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 182 of Plaintiffs' Amended Petition.

183. Paragraph 183 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 183 of Plaintiffs' Amended Petition.

184. Paragraph 185 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 184 of Plaintiffs' Amended Petition.

185. Paragraph 185 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 185 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 185.

186. Paragraph 186 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 186 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 186.

187. Paragraph 187 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 187 of Plaintiffs' Amended Petition.

188. Defendant denies the allegations in Paragraph 188 to the extent that they pertain to him. Otherwise, Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 188 of Plaintiffs' Amended Petition.

189. Defendant denies the allegations in Paragraph 189 to the extent that they pertain to him. Otherwise, Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 189 of Plaintiffs' Amended Petition.

190. Defendant denies the allegations in Paragraph 190 to the extent that they pertain to him. Otherwise, Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 190 of Plaintiffs' Amended Petition.

191. Paragraph 191 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 191 of Plaintiffs' Amended Petition.

192. Paragraph 192 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 192 of Plaintiffs' Amended Petition.

193. Paragraph 193 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 193 of Plaintiffs' Amended Petition.

194. Paragraph 194 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 194 of Plaintiffs' Amended Petition.

195. Paragraph 195 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 195 of Plaintiffs' Amended Petition.

196. Paragraph 196 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 196 of Plaintiffs' Amended Petition.

197. Paragraph 197 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 197 of Plaintiffs' Amended Petition.

198. Paragraph 198 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 198 of Plaintiffs' Amended Petition.

199. Paragraph 199 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 199 of Plaintiffs' Amended Petition.

200. Paragraph 200 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 200 of Plaintiffs' Amended Petition.

201. Paragraph 201 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 201 of Plaintiffs' Amended Petition.

202. Paragraph 202 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 202 of Plaintiffs' Amended Petition.

203. Paragraph 203 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 203 of Plaintiffs' Amended Petition.

204. Paragraph 204 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 204 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 204.

205. Paragraph 205 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 205 of Plaintiffs' Amended Petition.

206. Paragraph 206 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 206 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 206.

207. Paragraph 207 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 207 of Plaintiffs' Amended Petition.

208. Paragraph 204 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 208 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 208.

209. Paragraph 209 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 209 of Plaintiffs' Amended Petition.

210. Paragraph 210 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 210 of Plaintiffs' Amended Petition.

211. Paragraph 211 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 211 of Plaintiffs' Amended Petition.

212. Paragraph 212 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 212 of Plaintiffs' Amended Petition.

213. Paragraph 213 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 213 of Plaintiffs' Amended Petition.

214. Paragraph 214 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 214 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 214.

215. Paragraph 215 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 215 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 215.

216. Paragraph 216 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 216 of Plaintiffs' Amended Petition.

217. Paragraph 217 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 217 of Plaintiffs' Amended Petition.

218. Defendant admits the allegation in Paragraph 218 of Plaintiffs' Amended Petition.

219. Defendant denies the allegations in Paragraph 219 of Plaintiffs' Amended Petition

220. Defendant admits that Richard Hubbard was an employee/independent contractor of Data Center Equipment & Support LLC for period of time, but is without

sufficient factual knowledge to admit or deny the remainder of the allegations in Paragraph 220 of Plaintiffs' Amended Petition

221. Defendant denies the allegations in Paragraph 221 of Plaintiffs' Amended Petition.

222. Defendant denies the allegations in Paragraph 222 of Plaintiffs' Amended Petition

223. Defendant denies the allegations in Paragraph 223 of Plaintiffs' Amended Petition.

224. Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 224 of Plaintiffs' Amended Petition.

225. Paragraph 225 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 225 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 225.

226. Paragraph 215 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 226 of Plaintiffs' Amended Petition.

227. Paragraph 227 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 227 of Plaintiffs' Amended Petition.

228. Paragraph 228 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 228 of Plaintiffs' Amended Petition.

229. Paragraph 229 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 229 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 229.

230. Paragraph 230 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 230 of Plaintiffs' Amended Petition.

231. Paragraph 231 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 231 of Plaintiffs' Amended Petition.

232. Paragraph 232 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 232 of Plaintiffs' Amended Petition.

233. Paragraph 233 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 233 of Plaintiffs' Amended Petition.

234. Paragraph 234 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 234 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 234.

235. Paragraph 235 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 235 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 235.

236. Paragraph 236 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 236 of Plaintiffs' Amended Petition.

237. Paragraph 237 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 237 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 237.

238. Paragraph 238 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 238 of Plaintiffs' Amended Petition.

239 Paragraph 239 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 239 of Plaintiffs' Amended Petition.

240. Paragraph 240 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 240 of Plaintiffs' Amended Petition.

241. Paragraph 241 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 241 of Plaintiffs' Amended Petition.

242. Paragraph 242 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 242 of Plaintiffs' Amended Petition.

243. Paragraph 243 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 243 of Plaintiffs' Amended Petition.

244. Paragraph 244 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 244 of Plaintiffs' Amended Petition.

245. Paragraph 245 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 245 of Plaintiffs' Amended Petition.

246. Paragraph 246 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 246 of Plaintiffs' Amended Petition.

247. Paragraph 247 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 247 of Plaintiffs' Amended Petition.

248. Paragraph 248 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 248 of Plaintiffs' Amended Petition.

249. Paragraph 249 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 249 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 249.

250. Paragraph 250 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 250 of Plaintiffs' Amended Petition.

251. Paragraph 251 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 251 of Plaintiffs' Amended Petition.

252. Paragraph 252 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 252 of Plaintiffs' Amended Petition.

253. Paragraph 253 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 253 of Plaintiffs' Amended Petition.

254. Paragraph 254 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 254 of Plaintiffs' Amended Petition.

255. Paragraph 255 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 255 of Plaintiffs' Amended Petition.

256. Paragraph 256 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 256 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 256.

257. Paragraph 257 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 257 of Plaintiffs' Amended Petition.

258. Paragraph 258 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 258 of Plaintiffs' Amended Petition.

259. Paragraph 259 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 259 of Plaintiffs' Amended Petition.

260. Paragraph 260 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 260 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 260.

261. Paragraph 261 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 261 of Plaintiffs' Amended Petition.

262. Paragraph 262 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 262 of Plaintiffs' Amended Petition.

263. Paragraph 263 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 263 of Plaintiffs' Amended Petition.

264. Paragraph 264 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 264 of Plaintiffs' Amended Petition.

265. Paragraph 260 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 265 of Plaintiffs' Amended Petition.

266. Paragraph 266 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 266 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 266.

267. Paragraph 267 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 267 of Plaintiffs' Amended Petition.

268. Paragraph 268 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 268 of Plaintiffs' Amended Petition.

269. Paragraph 269 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 269 of Plaintiffs' Amended Petition.

270. Paragraph 270 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 270 of Plaintiffs' Amended Petition.

271. Paragraph 271 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 271 of Plaintiffs' Amended Petition.

272. Paragraph 272 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 272 of Plaintiffs' Amended Petition.

273. Paragraph 273 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 273 of Plaintiffs' Amended Petition.

274. Paragraph 274 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 274 of Plaintiffs' Amended Petition.

275. Paragraph 275 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 275 of Plaintiffs' Amended Petition.

276. Paragraph 276 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 276 of Plaintiffs' Amended Petition.

277. Paragraph 277 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 277 of Plaintiffs' Amended Petition.

278. Paragraph 278 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 278 of Plaintiffs' Amended Petition.

279. Paragraph 279 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 279 of Plaintiffs' Amended Petition.

280. Paragraph 280 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 280 of Plaintiffs' Amended Petition.

281. Paragraph 281 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 281 of Plaintiffs' Amended Petition.

282. Paragraph 282 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 282 of Plaintiffs' Amended Petition.

283. Paragraph 283 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 283 of Plaintiffs' Amended Petition.

284. Paragraph 284 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 284 of Plaintiffs' Amended Petition.

285. Paragraph 285 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 285 of Plaintiffs' Amended Petition.

286. Paragraph 286 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 286 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 286.

287. Paragraph 287 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 287 of Plaintiffs' Amended Petition.

288. Paragraph 288 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 288 of Plaintiffs' Amended Petition.

289. Paragraph 289 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 289 of Plaintiffs' Amended Petition.

290. Paragraph 290 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 290 of Plaintiffs' Amended Petition.

291. Paragraph 291 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 291 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 291.

292. Paragraph 292 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 292 of Plaintiffs' Amended Petition.

293. Paragraph 293 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 293 of Plaintiffs' Amended Petition.

294. Paragraph 294 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 294 of Plaintiffs' Amended Petition.

295. Defendant denies the allegation in Paragraph 295.

296. Paragraph 296 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 296 of Plaintiffs' Amended Petition.

297. Paragraph 297 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 297 of Plaintiffs' Amended Petition.

298. Paragraph 298 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 298 of Plaintiffs' Amended Petition.

299. Paragraph 299 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 299 of Plaintiffs' Amended Petition.

300. Paragraph 300 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 300 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 300.

301. Paragraph 301 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 301 of Plaintiffs' Amended Petition.

302. Paragraph 302 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 302 of Plaintiffs' Amended Petition.

303. Paragraph 303 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 303 of Plaintiffs' Amended Petition.

304. Paragraph 304 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 304 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 304.

305. Paragraph 305 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 305 of Plaintiffs' Amended Petition.

306. Paragraph 306 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 306 of Plaintiffs' Amended Petition.

307. Paragraph 307 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 307 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 307.

308. Paragraph 308 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 308 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 308.

309. Paragraph 309 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 309 of Plaintiffs' Amended Petition.

310. Paragraph 310 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 310 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 310.

311. Paragraph 311 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 311 of Plaintiffs' Amended Petition.

312. Paragraph 312 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 312 of Plaintiffs' Amended Petition.

313. Paragraph 313 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 313 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 313.

314. To the extent that Paragraph 314 is supposed to refer to this Defendant, it is denied. Defendant further specifically denies the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 314.

315. To the extent that Paragraph 315 is supposed to refer to this Defendant, it is denied. Defendant further specifically denies the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 315.

316. Defendant denies the allegations in Paragraph 316 to the extent that they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the remaining allegations in Paragraph 316 of Plaintiffs' Amended Petition.

317. Paragraph 317 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 317 of Plaintiffs' Amended Petition.

318. Paragraph 318 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 318 of Plaintiffs' Amended Petition.

319. Paragraph 319 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 319 of Plaintiffs' Amended Petition.

320. Paragraph 320 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 320 of Plaintiffs' Amended Petition.

321. Paragraph 321 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 321 of Plaintiffs' Amended Petition.

322. Paragraph 322 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 322 of Plaintiffs' Amended Petition.

323. Paragraph 323 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 323 of Plaintiffs' Amended Petition.

324. Paragraph 324 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 324 of Plaintiffs' Amended Petition.

325. Paragraph 325 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 325 of Plaintiffs' Amended Petition.

326. Paragraph 326 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 326 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 326.

327. Paragraph 327 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 327 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 327.

328. Paragraph 328 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 328 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 328.

329. Paragraph 329 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 329 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in

Paragraph 329.

330. Paragraph 330 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 330 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 330.

331. Paragraph 331 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 331 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 331.

332. Paragraph 332 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 332 of Plaintiffs' Amended Petition.

333. Paragraph 333 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 333 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 333.

334. Paragraph 334 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 334 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 334.

335. Paragraph 335 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 335 of Plaintiffs' Amended Petition.

336. Paragraph 336 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 336 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 336.

337. Paragraph 337 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 337 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 337.

338. Paragraph 338 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 338 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 338.

339. Paragraph 339 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 339 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 339.

340. Paragraph 340 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 340 of Plaintiffs' Amended Petition.

341. Paragraph 341 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 341 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 341.

342. Paragraph 342 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 342 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 342.

343. Paragraph 343 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 343 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 343.

344. Paragraph 344 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 344 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 344.

345. Paragraph 345 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 345 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 345.

346. Paragraph 346 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 346 of Plaintiffs' Amended Petition. Defendant does specifically deny the

existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 346.

347. Paragraph 347 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 347 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 347.

348. Paragraph 348 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 348 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 348.

349. Paragraph 349 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 349 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 349.

350. Paragraph 350 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 350 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 350.

351. Paragraph 351 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 351 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in

Paragraph 351.

352. Paragraph 352 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 352 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 352.

353. Paragraph 353 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 353 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 353.

354. Paragraph 354 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 354 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 354.

355. Paragraph 355 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 355 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 355.

356. Paragraph 356 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 356 of Plaintiffs' Amended Petition.

357. Paragraph 357 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 357 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 357.

358. Paragraph 358 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 358 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 358.

359. Paragraph 359 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 359 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 359.

360. Paragraph 360 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 360 of Plaintiffs' Amended Petition.

361. Paragraph 361 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 361 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 361.

362. Paragraph 362 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 362 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 362.

363. Paragraph 363 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 363 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 363.

364. Paragraph 364 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 364 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 364.

365. Paragraph 365 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 365 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 365.

366. Paragraph 366 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 366 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 366.

367. Paragraph 367 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 367 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 367.

368. Paragraph 368 does not involve an allegation against this Defendant, and

Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 368 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 368.

369. Paragraph 369 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 369 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 369.

370. Paragraph 370 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 370 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 370.

371. Paragraph 371 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 371 of Plaintiffs' Amended Petition.

372. Paragraph 372 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 372 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 372.

373. Paragraph 373 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 373 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in

Paragraph 373.

374. Paragraph 374 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 374 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 374.

375. Paragraph 375 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 375 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 375.

376. Paragraph 376 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 376 of Plaintiffs' Amended Petition.

377. Paragraph 377 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 377 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 377.

378. Paragraph 378 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 378 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 378.

379. Paragraph 379 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in

Paragraph 379 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 379.

380. Paragraph 380 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 380 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 380.

381. Paragraph 381 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 381 of Plaintiffs' Amended Petition.

382. Paragraph 382 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 382 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 382.

383. Paragraph 383 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 383 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 383.

384. Paragraph 384 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 384 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 384.

385. Paragraph 385 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 385 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 385.

386. Paragraph 382 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 386 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 386.

387. Paragraph 387 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 387 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 387.

388. Paragraph 388 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 388 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 388.

389. Paragraph 389 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 389 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 389.

390. Paragraph 390 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 390 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 390.

391. Paragraph 391 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 391 of Plaintiffs' Amended Petition.

392. Paragraph 392 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 392 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 392.

393. Paragraph 393 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 393 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 393.

394. Paragraph 394 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 394 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 394.

395. Paragraph 395 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 395 of Plaintiffs' Amended Petition. Defendant does specifically deny the

existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 395.

396. Paragraph 396 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 396 of Plaintiffs’ Amended Petition.

397. Paragraph 397 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 397 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 397

398. Paragraph 398 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 398 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 398.

399. Paragraph 399 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 399 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 399.

400. Paragraph 400 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 400 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 400.

401. Paragraph 401 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 401 of Plaintiffs' Amended Petition.

402. Paragraph 402 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 402 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 402.

403. Defendant denies the allegations in Paragraph 403 of Plaintiffs' Amended Petition.

404. Defendant denies the allegations in Paragraph 404 of Plaintiffs' Amended Petition.

405. Defendant denies the allegations in Paragraph 405 of Plaintiffs' Amended Petition.

406. Defendant denies the allegations in Paragraph 406 of Plaintiffs' Amended Petition.

407. Defendant denies the allegations in Paragraph 407 of Plaintiffs' Amended Petition.

408. Paragraph 408 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 408 of Plaintiffs' Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called "Venture" mentioned in Paragraph 408.

409. Paragraph 409 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 409 of Plaintiffs' Amended Petition. Defendant does specifically deny the

existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 409.

410. Paragraph 410 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 410 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 410.

411. Paragraph 411 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 411 of Plaintiffs’ Amended Petition.

412. Paragraph 412 does not involve an allegation against this Defendant, and Defendant is without sufficient factual knowledge to admit or deny the allegations in Paragraph 412 of Plaintiffs’ Amended Petition. Defendant does specifically deny the existence of, involvement with, or knowledge of the so-called “Venture” mentioned in Paragraph 412.

413. Paragraph 413 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 413 of Plaintiffs’ Amended Petition.

414. Defendant denies the allegations in Paragraph 414 of Plaintiffs’ Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 414 of Plaintiffs’ Amended Petition.

415. Paragraph 415 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 415 of Plaintiffs’ Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 415 of Plaintiffs’ Amended Petition.

416. Paragraph 416 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 416 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 416 of Plaintiffs' Amended Petition.

417. Paragraph 417 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 417 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 417 of Plaintiffs' Amended Petition.

418. Paragraph 418 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 418 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 418 of Plaintiffs' Amended Petition.

419. Paragraph 419 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 419 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 419 of Plaintiffs' Amended Petition.

420. Paragraph 420 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 420 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 420 of Plaintiffs' Amended Petition.

421. Paragraph 421 sets forth a legal conclusion to which no response is

required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 421 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 421 of Plaintiffs' Amended Petition.

422. Paragraph 422 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 422 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 422 of Plaintiffs' Amended Petition.

423. Paragraph 423 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 423 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 423 of Plaintiffs' Amended Petition.

424. Paragraph 424 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 424 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 424 of Plaintiffs' Amended Petition.

425. Paragraph 425 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 425 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 425 of Plaintiffs' Amended Petition.

426. Paragraph 426 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations

in Paragraph 426 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 426 of Plaintiffs' Amended Petition.

427. Paragraph 427 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 427 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 427 of Plaintiffs' Amended Petition.

428. Paragraph 428 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 428 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 428 of Plaintiffs' Amended Petition.

429. Paragraph 429 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 429 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 429 of Plaintiffs' Amended Petition.

430. Paragraph 430 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 430 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 430 of Plaintiffs' Amended Petition.

431. Paragraph 431 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 431 of Plaintiffs' Amended Petition as they pertain to him. Defendant is

without sufficient factual knowledge to admit or deny the other allegations in Paragraph 431 of Plaintiffs' Amended Petition.

432. Paragraph 432 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 432 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 432 of Plaintiffs' Amended Petition.

433. Paragraph 433 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 433 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 433 of Plaintiffs' Amended Petition.

434. Paragraph 434 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 434 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 434 of Plaintiffs' Amended Petition.

435. Paragraph 435 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 435 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 435 of Plaintiffs' Amended Petition.

436. Paragraph 436 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 436 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph

436 of Plaintiffs' Amended Petition.

437. Paragraph 437 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 437 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 437 of Plaintiffs' Amended Petition.

438. Paragraph 438 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 438 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 438 of Plaintiffs' Amended Petition.

439. Paragraph 439 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 439 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 439 of Plaintiffs' Amended Petition.

440. Paragraph 440 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 440 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 440 of Plaintiffs' Amended Petition.

441. Paragraph 441 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 441 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 441 of Plaintiffs' Amended Petition.

442. Paragraph 442 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 442 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 442 of Plaintiffs' Amended Petition.

443. Paragraph 443 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 443 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 443 of Plaintiffs' Amended Petition.

444. Paragraph 444 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 444 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 444 of Plaintiffs' Amended Petition.

445. Paragraph 445 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 445 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 445 of Plaintiffs' Amended Petition.

446. Paragraph 446 sets forth a legal conclusion to which no response is required. To the extent it would otherwise be required, Defendant denies the allegations in Paragraph 446 of Plaintiffs' Amended Petition as they pertain to him. Defendant is without sufficient factual knowledge to admit or deny the other allegations in Paragraph 446 of Plaintiffs' Amended Petition.

447. Defendant denies the allegations in Paragraph 447 of Plaintiffs' Amended Petition.

448. Defendant denies that Plaintiffs are entitled to any of the relief sought in their prayer (a) through (i)

449. Defendant hereby asserts the affirmative defense of statute of limitations as to all claims by Plaintiffs. Among other things, Plaintiffs knew of and participated in the allegedly wrongful conduct well more than 4 years before filing this suit and any actions by this Defendant that were supposedly a part of the "Venture" occurred no later than 2016 which is far outside the applicable statute of limitations period.

450. Defendant hereby asserts the affirmative defense that Plaintiffs were *in pari delicto* with regard to all of the activities alleged in Plaintiff's Amended Petition. The Plaintiffs' own petition describes their participation in the allegedly wrongful and illegal actions.

451. Defendant hereby asserts the affirmative defense of failure to mitigate. Plaintiffs each had multiple opportunities to "escape" the situation they allege and did not do so.

452. Defendant hereby asserts the affirmative defense of unclean hands.

453. Defendant hereby asserts that the injuries, damages and losses alleged by the Plaintiffs in the Amended Petition were caused in whole or in part by Plaintiffs themselves or by third parties over whom Defendant had no control. Plaintiffs' recovery, if any, should be barred or proportionately reduced by such fault or degree of responsibility.

454. If any loss, injury, damages, or detriment occurred as alleged in the First Amended Complaint, Defendant is entitled to an offset or setoff for the amounts Plaintiffs recover from any other person for such loss, injury, damages, or detriment including, but not limited to, amounts recovered from any settling party.

**WHEREFORE, PREMISES CONSIDERED, Defendant ROBERT PRUITT**

respectfully prays that upon final trial Plaintiffs take nothing, and for such other and further relief, to which he may show himself entitled.

Respectfully submitted,

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*(s) James M. Parker, Jr.*

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**ATTORNEYS FOR DEFENDANT,  
ROBERT PRUITT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of December 2023, the foregoing document, was filed with the Clerk of Court using the CM/ECF system, and was served on all counsel of record via E-mail:

*(s) James M. Parker, Jr.*

JAMES M. "JAMIE" PARKER, JR.